

EXHIBIT I

Holder, Casey

From: Holder, Casey
Sent: Monday, August 10, 2015 8:46 AM
To: Timothy Wedeen
Cc: Hunt, Dean D.; Hochmuth, Farrell; Smith, Rachel M.
Subject: RE: Adv. Pro. No. 10-05143 (Picard v. Marilyn Bernfeld Trust et al.) - Trustee's First Requests for Admission, Interrogatories, and Requests for Production
Attachments: Non Disclosure Agreement for E-Data Room 1.pdf; Undertaking and Consent to Be Bound by the LPO.PDF

Mr. Wedeen,

We received your email request for an extension of time to respond to the Trustee's Requests for Admission, Interrogatories, and Requests for Production in Adv. Pro. Nos. 10-05143 (Marilyn Bernfeld Trust), 10-04918 (Ellen Bernfeld), and 10-04841 (Bellini). In follow up to my voicemail on August 7, 2015, to date, we have yet to receive any responsive documents in any of the three matters. Initial Disclosures in all three cases are now nearly a year overdue, despite several emails and phone calls requesting the Initial Disclosures, as well as the Non-Disclosure Agreement and Undertaking and Consent to be Bound (again attached).

Moreover, fact discovery in each of these cases closes in early October. Given your near complete non-responsiveness thus far, we are not inclined to grant an extension of time. If we do not receive the responses to discovery in each case on the dates they are due, we will request a conference with Judge Bernstein. As a reminder, responses in Adv. Pro. No. 10-04918 (Ellen Bernfeld) are due August 10, 2015, and responses in Adv. Pro. Nos. 10-05143 (Marilyn Bernfeld Trust) and 10-04841 (Bellini) are due August 17, 2015.

Best regards,
Casey

Casey Holder | BakerHostetler
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From: Timothy Wedeen [<mailto:timothy.wedeen@gmail.com>]
Sent: Wednesday, August 05, 2015 11:56 AM
To: Holder, Casey
Cc: Hunt, Dean D.; Hochmuth, Farrell; Smith, Rachel M.
Subject: Re: Adv. Pro. No. 10-05143 (Picard v. Marilyn Bernfeld Trust et al.) - Trustee's First Requests for Admission, Interrogatories, and Requests for Production

Ms. Holder:

Will you consent to an enlargement of time for my clients to respond to these (including the additional Bernfeld matter)?

Of particular concern are the admissions, which have a strict time limit.

I would request until September 30, 2015, if that is possible.

On Tue, Jul 14, 2015 at 11:16 AM, Holder, Casey <cholder@bakerlaw.com> wrote:

Dear Counsel:

Enclosed please find the Trustee's First Set of Requests for Admission, Interrogatories, and Requests for Production to Defendants the Marilyn Bernfeld Trust, the Herbert Bernfeld Residuary Trust, H&E Company – A Partnership, Bernfeld Joint Venture – A Partnership, Marilyn Bernfeld, Ellen Bernfeld, and Thomas Bernfeld in the above referenced adversary proceeding. A hard copy of the same is being sent to your attention via first class mail.

Should you have any questions, please let us know.

Best regards,

Casey

Casey Holder | BakerHostetler

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